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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA, Plaintiff, v. **JOSE ANTONIO CENDEJAS-CASTRO,** Defendant.	CASE NO.: 08CR1144-WQH Date: May 19, 2008 Time: 1:30 p.m. NOTICE OF MOTIONS AND MOTIONS TO: (1) COMPEL DISCOVERY; (2) PRESERVE EVIDENCE; AND (3) GRANT LEAVE TO FILE FURTHER MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND CALEB E. MASON, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on May 19, 2008, at 1:30 p.m., or as soon thereafter as counsel may be heard, defendant, Jose Antonio Cendejas-Castro, by and through his attorneys, Hanni M. Fakhoury and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Defendant, Jose Antonio Cendejas-Castro, by and through his attorneys, Hanni M. Fakhoury and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to: infinite

(1) Compel Discovery;

(2) Preserve Evidence; and

(3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: May 19, 2008

s/ Hanni M. Fakhoury
HANNI M. FAKHOURY
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Cendejas-Castro

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

U S Attorney CR
U S Attorneys Office Southern District of California
880 Front Street
Room 6293
San Diego, CA 92101
(619)557-5610
Fax: (619)557-5917
Email: Efile.dkt.gc2@usdoj.gov

A courtesy copy:

Caleb E. Mason
Assistant United States Attorney
caleb.mason@usdoj.gov

Respectfully submitted,

Dated: May 19, 2008

/s/ Hanni M. Fakhoury

HANNI M. FAKHOURY
Federal Defenders of San Diego, Inc.
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Hanni_Fakhoury@fd.org